

1 NICHOLAS A. TRUTANICH  
2 United States Attorney  
3 Nevada Bar No. 13644  
4 DANIEL D. HOLLINGSWORTH  
5 Assistant United States Attorney  
6 Nevada Bar No. 1925  
7 501 Las Vegas Boulevard South, Suite 1100  
8 Las Vegas, Nevada 89101  
9 Telephone: 702-388-6336  
10 Email: Daniel.Hollingsworth@usdoj.gov  
11 Attorneys for the United States of America

12

13 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA ,

2:17-CR-110-APG-CWH

15 Plaintiff,

16 v.  
17 **Government's Unopposed Motion To**  
**Extend the Time to Reply to Whitmore's**  
**Objection (ECF No. 120) to the**  
**Government's Motion for Interlocutory**  
**Sale (ECF No. 113)**

18 Defendant.

19 **(First Request)**

20 The United States of America respectfully moves this Court for an Order extending  
21 the time for the government to reply to defendants' Objection to the Government's Motion  
22 for Interlocutory Sale (ECF No. 120). The government requests an extension of time to and  
23 including March 29, 2019. This is the first request.

24 The grounds for extending the time are as follows.

25 On February 26, 2019, the undersigned counsel called Robert Draskovich, counsel  
26 for defendant, who agreed to this extension of time.

27 The undersigned has a large and active case load. Undersigned has had many tightly  
28 scheduled deadlines with the court for complex issues that have taken large amounts of time  
and resources to complete. Undersigned has worked extremely hard and efficiently to meet  
all the deadlines, but he has not had time to address the Objection.

29 The Asset Forfeiture Unit (AFU) in the United States Attorney's Office for the  
30 District of Nevada (USAO) is understaffed. AFU lacks two paralegal specialists and one full

1 time forfeiture Assistant United States Attorney (AUSA) in Las Vegas and one AUSA in  
2 Reno, Nevada. The undersigned is currently the only forfeiture AUSA in the USAO.  
3 Between the lack of staff, the lack of forfeiture AUSAs, and the criminal forfeiture  
4 workload, the forfeiture work in the USAO has backed up significantly. The undersigned is  
5 doing the best he can under the circumstances.

6 This Motion is not submitted solely for the purpose of delay or for any other  
7 improper purpose.

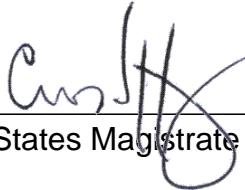
8 This Court should grant an extension of time to, and including, March 29, 2019, for  
9 the United States to reply to defendants' objection (ECF No. 120).

10 DATED: February 26, 2019.

11 NICHOLAS A. TRUTANICH  
12 United States Attorney

13 /s/ Daniel D. Hollingsworth  
14 DANIEL D. HOLLINGSWORTH  
15 Assistant United States Attorney

16 IT IS SO ORDERED:

17   
18 United States Magistrate Judge

19  
20 DATED: February 27, 2019

## **CERTIFICATE OF SERVICE**

A copy of the foregoing was served upon counsel of record via Electronic Filing on February 26, 2019.

/s/ Heidi L. Skillin  
HEIDI L. SKILLIN  
Asset Forfeiture Paralegal